

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

|                                     |   |                        |
|-------------------------------------|---|------------------------|
| (1) GREAT LAKES INSURANCE SE,       | ) |                        |
|                                     | ) |                        |
| Plaintiff,                          | ) |                        |
|                                     | ) |                        |
| v.                                  | ) | Case No. CIV-22-702-JD |
|                                     | ) |                        |
| (2) FREDY VALLE d/b/a VALLE         | ) |                        |
| TRUCKING;                           | ) |                        |
| (3) SILVER STAR CONSTRUCTION        | ) |                        |
| COMPANY, INC.;                      | ) |                        |
| (4) TYLON MACKEY;                   | ) |                        |
| (5) ISRAEL JUAREZ;                  | ) |                        |
| (6) ORD TRUCKING, INC.;             | ) |                        |
| (7) ZURICH AMERICAN INS. CO.        | ) |                        |
|                                     | ) |                        |
| Defendants.                         | ) |                        |
|                                     | ) |                        |
| and                                 | ) |                        |
|                                     | ) |                        |
| (8) ZURICH AMERICAN INS. CO.,       | ) |                        |
|                                     | ) |                        |
| Third-Party Plaintiff,              | ) |                        |
| v.                                  | ) |                        |
|                                     | ) |                        |
| (9) BERKSHIRE HATHAWAY              | ) |                        |
| HOMESTATE INS. CO., and             | ) |                        |
| (10) PROGRESSIVE NORTHERN INS. CO., | ) |                        |
|                                     | ) |                        |
| Third-Party Defendants.             | ) |                        |

**PLAINTIFF’S UNOPPOSED MOTION FOR LEAVE TO FILE ITS EXHIBIT**  
**LIST OUT OF TIME**

Plaintiff Great Lakes Insurance SE (“Great Lakes”) request the court grant it leave to file its final exhibit list out of time. In support thereof, Plaintiff submits as follows:

1. Pursuant to current Scheduling Order set forth by the Court, Plaintiff's exhibit and witness lists were due one week ago, September 5, 2023.

2. Counsel for Plaintiff mistakenly read that *only* witness lists were due on September 5, 2023 and therefore filed only Plaintiff's witness list and not its exhibit list.

3. Plaintiff has conferred with all parties, and no one has expressed an objection to Plaintiff filing its exhibit list out of time.

4. Good cause exists for Plaintiff to file its exhibit list out of time, and doing so is not for the purposes of delay.

5. Plaintiff has submitted a proposed order with this Unopposed Motion for the Court's consideration and has provided all parties with its proposed exhibit list.

WHEREFORE, Plaintiff respectfully requests that the Court grant its Unopposed Motion to File its Witness List Out of Time and all other relief this Court deems just.

DOERNER, SAUNDERS, DANIEL & ANDERSON,  
L.L.P.

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*Attorneys for Plaintiff Great Lakes Insurance  
SE*

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that on September 15, 2023, I electronically filed the foregoing Final  
Witness & Exhibit List the Clerk of the U.S. District Court, Western District of Oklahoma,  
using the electronic case filing system of the Court.

*s/Emily Allan*

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